UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIAN SILVA, ET AL

Plaintiffs,

٧.

JOSE VAZQUEZ COFRESI, ET AL

Defendants.

JOSE VAZQUEZ

Counterclaimant,

v.

JULIAN SILVA

Counterclaim Defendant

ECF CASE

Case No. 13-cv-3200-CM

JOINT MOTION TO EXTEND DISCOVERY CUTOFF AND RESET DATES

11/1/2013 ADOED

MEMO ENDORSED

Plaintiff JULIAN SILVA, individually, and JULIAN SILVA, on behalf of HANDLE WITH CARE PRODUCTIONS, INC. ("Plaintiff") and Defendants JOSE VAZQUEZ COFRESI ("Vazquez"), individually, and HANDLE WITH CARE PRODUCTIONS, INC. ("Handle With Care"), (collectively "Defendants") jointly move the Court for an order (1) extending the discovery cutoff in this case and (2) resetting all scheduled dates in this case. This is the parties' first request for any extension in this case.

The parties currently have a settlement conference scheduled before Magistrate Judge Francis on November 12, 2013.

The current case management plan contains the following deadlines:

- 1. Close of discovery November 21, 2013
- 2. Joint pretrial order January 6, 2013

In order to save resources and minimize costs to the parties before the scheduled settlement conference, the parties request that the Court reset all pending dates as follows:

1. Close of discovery –January 17, 2014

Case 1:13-cv-03200-CM Document 22 Filed 11/04/13 Page 2 of 2

Case 1:13-cv-03200-CM Document 21 Filed 10/29/13 Page 2 of 2

2. Joint pretrial order – February 28, 2014.

Dated: October 29, 2013

Respectfully submitted:

/s/ Peter Dee

Peter Dee Mavronicolas Mueller & Dee LLP 950 Third Avenue, 10th Floor New York, NY 10022 (646) 770-0024 1(866) 774-9005 (fax) pdee@mavrolaw.com Attorneys for Plaintiffs and Counterdefendant /s/ Michael D. Steger

Michael D. Steger (MS2009)
Steger Krane LLP
1601 Broadway, 12th Floor
New York, NY 10019
(212) 736-6800
(845) 689-2155 (fax)
msteger@skattorney.com
Attorneys for Defendants and
Counterclaimant